

Yvonne V. Jorgensen (SBN 136264)  
VAN DE POEL, LEVY, THOMAS LLP  
1600 South Main Plaza, Suite 325  
Walnut Creek, California 94596  
Telephone: (925) 934-6102  
Facsimile: (925) 934-6060  
Email: [yjorgensen@vanlevylaw.com](mailto:yjorgensen@vanlevylaw.com)

Attorney for Defendant,  
LIVE NATION ENTERTAINMENT, INC.

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MLW Media LLC,

Plaintiff,

v.

WORLD WRESTLING ENTERTAINMENT,  
INC.,

Defendant.

CASE NO.: 5:22-cv-00179-EJD

**OBJECTIONS TO SUBPOENA**

*Complaint Filed: TBA*

LIVE NATION ENTERTAINMENT INC objects to MLW Media LLC's subpoena as follows.

**REQUEST FOR PRODUCTION NO.1**

All documents relating to:

- a) The negotiation of exclusivity provisions in contracts and contract amendments with WWE concerning the booking of any Live Nation Venue;
- b) WWE's request for exclusivity in the booking of, or attempt to book, any Live Nation Venue for events; and
- c) Communications with WWE concerning third parties' or Competitors' booking of, or attempt to book, any Live Nation Venue for events.

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**RESPONSE TO REQUEST FOR PRODUCTION NO.1**

Live Nation Entertainment Inc objects to this request as overbroad, and therefore unreasonable and oppressive, as there is no limitation as to time. This request is vague as to the term “exclusivity”. Live Nation Entertainment Inc further objects that this request calls for disclosure of privileged information, including confidential information. The complaint references activity back to 2001, which implies plaintiff is seeking 22 years of records, which is clearly unduly burdensome.

Without waiving the foregoing objections, Live Nation Entertainment Inc met and conferred with counsel for MLW Media Inc regarding definition of “exclusivity” and agreed to the definition as excluding the rental period. Live Nation Entertainment Inc. has made a diligent search and has not located any documents responsive to this request.

**REQUEST FOR PRODUCTION NO. 2**

All documents relating to requests by WWE that you cancel, refuse to book, or refuse to promote non-WWE events, including events of Competitors, held at any Live Nation Venue, including but not limited to documents relating to:

a) Threats by WWE that retaliatory actions would be taken if you allowed non-WWE events, including events of Competitors, to be booked or to take place at any Live Nation Venue; and

b) Any provision in any agreement with WWE that prohibits, hinders, or limits you from booking or promoting events with Competitors, including but not limited to provisions that prevent you from booking or promoting any Competitor’s events within a certain time period before or after a WWE event held at any Live Nation Venue.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2**

Live Nation Entertainment Inc objects to this request as overbroad, and therefore unreasonable and oppressive, as there is no limitation as to time. Live Nation Entertainment Inc further objects that this request vague and ambiguous. The complaint references activity back to 2001, which implies that plaintiff is seeking 22 years of records, which is clearly unduly burdensome.

Without waiving the foregoing objections, Live Nation Entertainment Inc. has made a diligent search and has not located any documents responsive to this request.

1 **REQUEST FOR PRODUCTION NO. 3**

2 All documents relating to the Action, including but not limited to communications with third  
3 parties relating to any subpoena issued seeking evidence or testimony relevant to the Action.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3**

5 Live Nation Entertainment Inc objects to this request as overbroad, and therefore  
6 unreasonable and oppressive, as there is no limitation as to time. The complaint references activity  
7 back to 2001, which implies that plaintiff is seeking 22 years of records, which is clearly unduly  
8 burdensome.

9 Live Nation Entertainment Inc further objects that this request vague and ambiguous. Live  
10 Nation Entertainment is not a party to the action, is not aware of what subpoenas have been issued in  
11 the action, and would have to speculate to determine what documents relate to the Action.

12 DATED: August 7, 2023

VAN DE POEL, LEVY, THOMAS LLP

14 By: *Yvonne V. Jorgensen*  
15 YVONNE V. JORGENSEN  
16 Attorney for Defendant,  
17 LIVE NATION ENTERTAINMENT, LLC  
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## PROOF OF SERVICE

I am employed in the County of Contra Costa, State of California. I am over the age of 18 and am not a party to the within action. My business address is at Van De Poel, Levy, Thomas LLP, 1600 South Main Plaza, Suite 325, Walnut Creek, CA 94596.

On August 7, 2023, I served the foregoing document(s) described as:

## OBJECTIONS AND RESPONSE TO SUBPOENA

on all other parties and/or their attorney(s) of record to this action as follows:

\*\*\* SEE ATTACHED SERVICE LIST \*\*\*

<input type="checkbox"/>	<b>By United States Postal Service:</b> I am a resident of, or employed in, the county where the mailing occurs; I am over the age of 18 years and am not a party to the cause. I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service. The envelope was placed for deposit in the United States Postal Service at Van De Poel, Levy, Thomas LLP, in Walnut Creek, California on August 7, 2023. The envelope was sealed and placed for collection and mailing with first-class prepaid postage on that date following ordinary business practices. Service made pursuant to CCP § 1013a(3), upon motion of a party served, shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained in the affidavit.
<input checked="" type="checkbox"/>	<b>By Electronic Service:</b> My electronic business address is ldesilva@vanlevylaw.com and I caused such documents (s) to be electronically served by e-mailing the attached document(s) to the person(s) at the e-mail address(es) listed below on August 7, 2023, pursuant to Code of Civil Procedure § 1010.6 (e). No electronic message or other indication that the transmission was unsuccessful was received within a reasonable time after the transmission."
<input type="checkbox"/>	<b>By Facsimile:</b> By faxing a copy of the above-referenced document(s) to the addressee at the number set forth beneath their above-listed address. At the completion of the transmission, a Transmission Report was generated, confirming transmission and receipt by the addressee(s).
<input type="checkbox"/>	<b>By Personal Delivery:</b> By personally delivering a true copy thereof to the person(s) and at the address(es) set forth below.
<input type="checkbox"/>	<b>By Overnight Delivery:</b> At the address(es) listed herein above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on August 7, 2023, at Walnut Creek, Contra Costa County, California.

  
 Lisa S. DeSilva

**SERVICE LIST**

Case:	MLW Media LLC v. World Wrestling Entertainment, Inc.
Court:	United States District Court for the Northern District of California, Case No.: 5:22-cv-00179-EJD
Represent:	Live Nation Entertainment, Inc.

Marc E. Kasowitz (pro hac vice)  
Christine A. Montenegro (pro hac vice)  
Nicholas A. Rendino (pro hac vice)  
KASOWITZ BENSON TORRES LLP  
1633 Broadway  
New York, NY 10019  
Telephone: (212) 506-1700  
Facsimile: (212) 506-1800  
Email: [mkasowitz@kasowitz.com](mailto:mkasowitz@kasowitz.com)  
[cmontenegro@kasowitz.com](mailto:cmontenegro@kasowitz.com)  
[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)

Jason S. Takenouchi, Esq.  
KASOWITZ BENSON TORRES LLP  
101 California Street, Suite 3000  
San Francisco, California 94111  
Telephone: (415) 421-6140  
Facsimile: (415) 398-5030  
Email: [jtakenouchi@kasowitz.com](mailto:jtakenouchi@kasowitz.com)

**Attorneys for Plaintiff,  
MLW MEDIA LLC**

Karen Dun  
Paul Weiss  
2001 K Street, NW  
Washington, DC 20006-1047  
Tel: +1-202-223-7308  
[kdunn@paulweiss.com](mailto:kdunn@paulweiss.com)  
**Attorneys for Defendant,  
WORLD WRESTLING  
ENTERTAINMENT, INC.**